

Honorable Ricardo S. Martinez

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN BABAROVICH,

Plaintiff,

vs.

STANDARD GUARANTY INSURANCE
COMPANY, a Delaware Corporation,

Defendant.

NO. 2:19-CV-01395

STIPULATED MOTION AND AGREED
ORDER TO EXTEND CASE
DEADLINES

STIPULATED MOTION

COMES NOW Plaintiff John Babarovich (“Babarovich”) and Defendant Standard Guaranty Insurance Company (“SGIC”) (collectively, the “Parties”), by and through their counsel of record and, pursuant to FRCP 26, LCR 7(d)(1) and 10(g), and the Court’s January 7, 2020 Order Setting Trial and Related Dates (Dkt. 16), file this Joint Motion to extend the case scheduling deadlines set forth below. In support of this Stipulated Motion, the Parties show the Court as follows:

The Court set the current case schedule shortly before the COVID-19 pandemic began. *See* Dkt. 16. Since the onset of the pandemic, the Parties have had difficulty meeting with and working with their experts, who have been indisposed or otherwise unable to perform the

STIPULATED MOTION AND AGREED ORDER - Page 1


INSLEE BEST
INSLEE, BEST, DOEZIE & RYDER, PS
Attorneys at Law
10900 NE 4th Street, Suite 1500
P.O. Box 90016
Bellevue, WA 98009-9016
425.455.1234

1 expected services. In addition, Plaintiff John Babarovich is in the midst of cancer treatment,
 2 making it more difficult for him to meet with counsel and experts, prepare for and sit for
 3 deposition, etc. In addition, the Parties desire to explore resolution before undertaking additional
 4 discovery efforts. Finally, in the event that resolution does not occur, the Parties desire to set a
 5 case schedule that allows for the completion of all fact discovery, followed by a period for expert
 6 reports and expert depositions. The Parties have conferred and propose the following case
 7 schedule:

8	BENCH TRIAL DATE	July 26, 2021
9	Deadline for discovery motions	December 4, 2020
10	Fact discovery deadline	January 15, 2021
11	Initial expert report deadline	February 12, 2021
12	Rebuttal expert report deadline	March 5, 2021
13	Expert deposition deadline	March 19, 2021
14	Dispositive motion deadline	April 16, 2021
15	Motions in limine deadline	June 18, 2021
16	Agreed pre-trial order	July 2, 2021
17	Trial briefs and proposed findings of fact and	July 16, 2021
18	conclusions of law, designations of deposition	
	testimony, and trial exhibits	

19 THEREFORE, the Parties jointly move the Court for an Order extending the deadlines
 20 as reflected above. Attached is a proposed Order granting the Joint Motion.
 21
 22
 23

INSLEE BEST DOEZIE & RYDER, P.S.

COZEN O'CONNOR

Gregory L. Ursich WSBA #18614
Attorney for Plaintiff John Babarovich

/s/ KEVIN A. MICHAEL

Kevin A. Michael WSBA #36976
Attorney for Defendant Standard
Guaranty Insurance Company

DATED on this ____ day of Sept., 2021

DATED on this ____ day of Sept., 2021

AGREED ORDER

IT IS, based on the above stipulation of counsel for all Parties, hereby ORDERED that the pending deadlines are extended as follows:

BENCH TRIAL DATE

July 26, 2021

Deadline for discovery motions

December 4, 2020

Fact discovery deadline

January 15, 2021

Initial expert report deadline

February 12, 2021

Rebuttal expert report deadline

March 5, 2021

Expert deposition deadline

March 19, 2021

Dispositive motion deadline

April 16, 2021

Motion in limine deadline

June 18, 2021

Agreed pre-trial order

July 2, 2021

Trial briefs and proposed findings of fact and
conclusions of law, designations of deposition
testimony, and trial exhibits

July 16, 2021

IT IS SO ORDERED this 21st day of September, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

So stipulated and presented by:

INSLEE, BEST, DOEZIE & RYDER, P.S.

By _____

Gregory L. Ursich, WSBA No. 18614

Attorney for John Babarovich

10900 NE 4th Street, Suite 1500

Bellevue, Washington 98004

Tel: (425) 455-1234

Fax: (425) 635-7720999

Email: gursich@insleebest.com

So stipulated and copy received:

COZEN O'CONNOR

/s/ KEVIN A. MICHAEL

Kevin A. Michael, WSBA # 36976

Nadia A. Bugaighis, WSBA #45492

Attorneys for Defendant Standard Guaranty

Insurance Company

Third Avenue, Suite 1900

Seattle, WA 98104

Tel: (206) 340-1000

STIPULATED MOTION AND AGREED ORDER - Page 4



INSLEE BEST
INSLEE, BEST, DOEZIE & RYDER, PS
Attorneys at Law
10900 NE 4th Street, Suite 1500
P.O. Box 90016
Bellevue, WA 98009-9016
425.455.1234